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Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT  
FOR THE  
NORTHERN MARIANA ISLANDS

MODESTA MANGLONA NADAR,

Plaintiff,

vs.

EFREM S. TAIMANAO dba JOE &  
SON'S ENT.,

Defendant.

CIVIL CASE NO. 07 - 0023

DEFENDANT'S CASE  
MANAGEMENT CONFERENCE  
STATEMENT

COMES NOW the defendant, by and through counsel, and files his Case Management Conference Statement as follows:

- a. Service of process on parties not yet served: The single party defendant was served and the answer has been filed.
- b. Jurisdiction and venue: The Court has jurisdiction over this matter and venue is proper in this district.
- c. Track assignment: The defendant agrees with the court to assigned this case to the standard track.
- d. Anticipated Motion: Defendant intends to file dispositive motions.
- e. Anticipated discovery: Defendant intends to propound interrogatories, request for admissions, production of documents, and deposition of material witnesses.
- f. Further proceedings: None anticipated at this time.

1 g. Special proceedings: None anticipated at this time.

2 h. Modification of pretrial procedures: No modification of  
3 the standard pretrial procedures is required.

4 i. Settlement prospects: Settlement may be calendared as the parties exchange  
5 discovery and a better understanding of the facts are disclosed.

6 j. Other matters including limitations of issues: Nothing is anticipated at this time.

7 k. Setting of dates: The defendant proposes the following scheduling dates:

8 1. Joinder of All Parties: In September of 2008.

9 2. Motion to Amend: In October of 2008.

10 3. Discovery Cut- Off: In March of 2008.

11 4. Status Conferences: In December of 2007.

12 5. Discovery Motion Hearing Date: In February of 2008.

13 6. Dispositive Motion Cut-off: In March of 2008.

14 7. Dispositive Motion Hearing Date: In April of 2008.

15 8. Settlement Conference: In February of 2008.

16 9. Joint Pretrial Order: Seven days prior to the actual trial date.

17 10. Final Pretrial Conference: Seven days prior to the actual trial date.

18 11. Trial: In June of 2008.

19 Dated this 31<sup>st</sup> day of August, 2007.

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22 /s/  
23 Perry B. Inos, Esq.  
24 Attorney for Defendant  
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